

REMARKS/ARGUMENTS

This letter is responsive to the final office action dated August 19, 2008, and the advisory action dated October 29, 2008.

In the office action, the Examiner maintained his rejection of claims 1, 5-14, 23, 27-36, and 45-46 under 35 U.S.C. 103(a) as being obvious in view of U.S. Patent No. 7,216,072 in the name of Kasai et al. ("Kasai"). The Applicants respectfully traverse all rejections.

As a preliminary matter, the Applicants note that the skilled person will appreciate that Kasai teaches a number of mutually exclusive embodiments. There is no suggestion in Kasai that different features of different embodiments may be selected and combined in different combinations. In particular, it will be clearly understood that Kasai's first embodiment, fourth embodiment, and fifth embodiment relate to independent embodiments.

In the Applicants' previous response, the Applicants distinguished the subject matter of the Applicants' claims from Kasai's fourth and fifth embodiments since the arguments made by the Examiner in the final office action referenced these specific embodiments. In the advisory action, the Examiner does not dispute the fact that the subject matter of the Applicants' claims is distinguishable from Kasai's fourth and fifth embodiments.

Applicants thank the Examiner for clarifying his position in the advisory action, by arguing that the subject matter of Applicants' claims is obvious in view of Kasai's **first** embodiment. Respectfully, however, the Applicants disagree.

The Examiner observes that "In Kasai's first embodiment... he teaches that the translated text server (proxy server) receives a request in text (URL information) and if the HTML data corresponding to the URL do not exist in the cache, the translated text cache server obtains an HTML file from the WWW server..." (emphasis added). The HTML file can be sent to the translation server so that a homepage may be translated.

It appears that in Kasai's first embodiment, the translation server does appear able to accept HTML as input; however, now the proxy server described in respect of that embodiment (i.e. the translated text server) does not provide the requisite functionality as defined in the Applicants' claims. In particular, the translated text server does not convert the initial message from a text format to HTML format. It is clear from the Examiner's own excerpt of Kasai that the translated text server merely receives a URL, and causes the HTML file retrievable at a location on the Internet defined by the URL to be retrieved. The skilled person would not understand that this is a conversion of the initial message from text to HTML by the translated text server, as no actual re-formatting is performed by the translated text server. In fact, the HTML file to be translated already pre-exists, and accordingly, there would be no need for the translated text server to "convert" message text into HTML format.

To expedite prosecution of the application, and to address the Examiner's remaining concerns, the independent claims have been amended to clarify that text in the message is converted into the new format (i.e. HTML) by the proxy server. It is clear that the "request in text (URL information)" as received by the translated text server of Kasai is not equivalent to text in the message (i.e. actual message text) being received by the Applicants' proxy server. In the Applicants' claimed embodiments, the actual text in the initial message is received by the proxy server and is subject to conversion by the proxy server, in contrast to a mere reference to a pre-existing HTML file that may be received by Kasai's

Appl. No. 10/772,476

Reply Dated November 19, 2008

Reply to Office Action of August 19, 2008 and Advisory Action dated October 29, 2008

translated text server. Claims 8 and 30 have been amended to conform with the amendments made to the independent claims.

In view of the foregoing, the Applicants submit that the subject matter of claims 1, 5-14, 23, 27-36, and 45-46 is not obvious in view of Kasai. Withdrawal of the remaining objections under 35 U.S.C. 103 is respectfully requested.

Yours truly,

BERESKIN & PARR
Agents for the Applicants



Kendrick Lo
Reg. No. 54,948
(416) 364-7311